

January 29, 2018

**Via SCPSC E-FILING DMS**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

**Re: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans;**

**Docket No. 2017-370-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton  
(SC Bar No. 80073)

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*Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.*

SUE/sds  
Attachments  
c: Certificate of Service

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2017-370-E

IN RE: Joint Application and Petition of  
South Carolina Electric & Gas Company and  
Dominion Energy, Incorporated for Review  
and Approval of a Proposed Business  
Combination between SCANA Corporation  
and Dominion Energy, Incorporated, as May  
Be Required, and for a Prudency  
Determination Regarding the Abandonment  
of the V.C. Summer Units 2 & 3 Project and  
Associated Customer Benefits and Cost  
Recovery Plans

Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10<sup>th</sup>

Street, Bentonville, AR 72716-0550.

3. Walmart is a large commercial customer of SCE&G. Walmart has approximately 35 facilities in South Carolina that are served by SCE&G, which include Walmart Supercenters, Sam's Clubs, and gas stations. Walmart purchases more than 140 million kWh annually from SCE&G. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to SCE&G's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from SCE&G pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

4. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Brandfass be added jointly to the service list as Walmart may seek Mr. Williamson's and Ms. Brandfass' admissions to appear

before the Commission *pro hac vice* in the near future.

5. This Petition to Intervene is timely filed as no intervention deadline has yet been set.

**WHEREFORE**, Wal-Mart Stores East, LP and Sam's East, Inc., respectfully request that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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*Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.*

Dated: January 29, 2018



STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
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Abandonment of the V.C. Summer Units 2 & 3 )  
Project and Associated Customer Benefits and )  
Cost Recovery Plans )  
)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Dated: January 29, 2018